

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: ALYCE JO LENTZ : CHAPTER 13  
Debtor(s) :  
CHARLES J. DEHART, III :  
STANDING CHAPTER 13 TRUSTEE :  
vs. :  
ALYCE JO LENTZ :  
Respondent(s) : CASE NO. 1-16-bk-01411

TRUSTEE'S OBJECTION TO AMENDED CHAPTER 13 PLAN

AND NOW, this 20th day of September, 2016, comes Charles J. DeHart, III, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor(s)' plan for the following reason(s):

1. The Trustee avers that debtor(s)' plan is not feasible based upon the following:
  - a. Insufficient Monthly Net Income as indicated on Schedules I and J. (-\$943.34)
  - b. The plan is inconsistent with Proofs of Claims filed and/or approved by the Court. (Department of Revenue-secured claim)
  - c. Plan ambiguous – payment
2. The Trustee provides notice to the Court as to the ineffectiveness of debtor(s) Chapter 13 Plan for the following reasons:
  - a. Other plan provisions. (Termination of payments upon stay relief)

WHEREFORE, Trustee alleges and avers that debtor(s) plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.
- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

Charles J. DeHart, III  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
(717) 566-6097

BY: /s/James K. Jones

Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 20th day of September, 2016, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Harrisburg, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Michael Travis, Esquire  
3904 Trindle Road  
Camp Hill, PA 17011

/s/Deborah A. Behney  
Office of Charles J. DeHart, III  
Standing Chapter 13 Trustee